

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Blake Lively,
Plaintiff,
v.
Wayfarer Studios LLC, et al.,
Defendants.

Case No. 1:24-cv-10049-LJL

**NON-PARTY JANE DOE MOTION FOR LEAVE TO PROCEED UNDER A
PSEUDONYM AND TO FILE IDENTIFYING INFORMATION UNDER SEAL**

Non-party “Jane Doe” respectfully moves this Court for leave to proceed under a pseudonym in connection with her Response in Support of Non-Party Mario Armando Lavandeira, Jr.’s Motion for Protective Order.

I. Relief Requested

Pursuant to Federal Rule of Civil Procedure 5.2, this Court’s inherent authority, and applicable precedent, Jane Doe requests that the Court:

1. Permit her to proceed in this matter under the pseudonym “Jane Doe.”
2. Permit her to file her true name and address under seal.
3. Direct the Clerk of Court to maintain all sealed identifying information as confidential and not accessible to the public.

II. Basis for Request

Jane Doe is a non-party who has expressed lawful opinions online concerning the parties and issues in this case. She has no direct involvement in the underlying dispute. She seeks to submit her statement in support of another non-party’s motion while avoiding undue harassment, professional reputational harm, and potential retaliation from highly devoted supporters of either party, as described in her accompanying filing.

Courts in this Circuit recognize that anonymity may be appropriate where identification would place a non-party at risk of harassment or retaliation, or where the disclosure of identity is unnecessary to resolve the issues presented. *See, e.g., Doe v. Delta Airlines, Inc.*, 310 F.R.D. 222, 224 (S.D.N.Y. 2015); *Sealed Plaintiff v. Sealed Defendant #1*, 537 F.3d 185, 189 (2d Cir. 2008).

Jane Doe’s situation satisfies the factors set forth in *Sealed Plaintiff*, including:

- The highly sensitive and personal nature of her speech-related concerns.
- The risk of retaliatory action or harassment from individuals associated with the parties.
- The absence of prejudice to any party from allowing anonymity.
- The fact that her identity is not material to the legal issues presented.

III. Conclusion

For the foregoing reasons, Jane Doe respectfully requests that the Court grant this motion, permit her to proceed under a pseudonym, and allow her identifying information to be filed under seal.

Dated: August 12, 2025

Respectfully submitted,

Jane Doe

[If approved, address will be submitted under seal]